

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1

PYFER LAW GROUP, LLC
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In re:

MONIQUE HARVEY,

Debtor.

Case No. 21-17242 (CMG)

Chapter 13

Hearing Date: July 6, 2022
at 9:00 AM

**OPPOSITION TO MOTION OF CHAPTER 13 STANDING TRUSTEE TO DISMISS
THE DEBTOR'S CHAPTER 13 CASE**

Scott C. Pyfer, Esq. certifies as follows:

1. I am the attorney for Monique Harvey, the Debtor in this Chapter 13 case. I have knowledge of the facts set forth in this Certification.

2. According to ndc.org, the Debtor has remitted to the Trustee all payments due under the Chapter 13 Plan which was filed on October 11, 2021, and which was confirmed on February 7, 2022, through June, 2022. The Trustee had asserted that \$1,950 was due from the Debtor as of June 1, 2022.

3. Earlier today I filed a modified Chapter 13 Plan, to clarify that the Debtor does not require a mortgage loan modification in order to complete full payment of the Debtor's pre-petition mortgage loan arrearages. That clarification addresses the Trustee's second reason asserted for dismissal of this case, that the Debtor has not obtained a mortgage loan modification.

4. For the foregoing reasons, the Debtor respectfully submits that the Trustee's motion to dismiss the Debtor's Chapter 13 case should be denied.

/s/ Scott C. Pyfer
Scott C. Pyfer

Dated: June 29, 2022